

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**v.**

**JOHN J. WOODS, ET AL.,**

**Defendants,**

Civil Action No.  
1:21-cv-3413-SDG

**FIFTH APPLICATION FOR COMPENSATION TO  
GRIER WRIGHT MARTINEZ, PA,  
ATTORNEYS FOR THE RECEIVER**

A. Cotten Wright, the duly appointed receiver (the “Receiver”) for Horizon Private Equity, III, LLC (“Horizon”) and certain assets of John J. Woods (“Woods”) in the above-captioned civil action (this “Case”), hereby submits this *Fifth Application for Compensation to Grier Wright Martinez, PA, Attorneys for the Receiver* (this “Application”) for the period of July 1, 2022 through September 30, 2022 (the “Application Period”). This Application has been prepared in accordance with the Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission (the “SEC Guidelines”).

## **I. BACKGROUND**

On August 20, 2021, the U.S. Securities and Exchange Commission (the “SEC”) filed a *Complaint* (Doc. No. 1) against Woods, Horizon, and Livingston Group Asset Management Company alleging violations of the Securities Act of 1933, the Securities and Exchange Act of 1934, the Investment Advisers Act of 1940, and various regulations promulgated thereunder, thereby initiating this Case. On September 1, 2021, the Court entered its *Order Appointing Receiver* (the “Receivership Order”) appointing the Receiver to perform certain duties as set forth in that Order.<sup>1</sup> (Doc. No. 26). On September 10, 2021, the Court entered an Order authorizing the Receiver to employ Grier Wright Martinez, PA (“GWM”) as her attorneys in this case.

## **II. SUMMARY OF PROFESSIONAL FEES AND REIMBURSEMENT OF EXPENSES REQUESTED**

The Receivership Order requires the Receiver to file Quarterly Fee Applications with the Court for compensation and reimbursement of expenses. This Application reflects the fourth interim application for compensation and expense reimbursement for the GWM covering the Application Period.

GWM’s professionals, including the Receiver, expended a total of 348.20

---

<sup>1</sup> The Receivership Order was amended on September 9, 2021 to correct certain typographical errors. (Doc. No. 53).

hours on the Receivership Case during the Application Period, incurring fees totaling \$102,169.00. During this Application Period, some time entries were billed at fifty percent (50%) given the nature of certain tasks that were performed. Through this Application, the Receiver requests allowance of interim compensation for professional services rendered to the Receivership Estate in the amount of \$97,060.55, which reflects a 5% discount from GWM's actual fees, and reimbursement of \$1,995.84 in actual and necessary expenses. No time has been billed for preparing this Application.

In accordance with the SEC Guidelines, the following exhibits are attached:

- Certification regarding compliance by the Receiver and GWM with the SEC Guidelines, Exhibit A;
- Standardized Fund Accounting Report for the Application Period, Exhibit B;
- GWM's Fee Schedule<sup>2</sup> for the Application Period, Exhibit C; and
- GWM's invoices for the Application Period, setting out its time records and expenses, Exhibit D; and

---

<sup>2</sup> Although the firm increased its billing rates as of January 1, 2022, that increase was not applied to this matter.

- Summary of GWM expenses for the Application Period,

Exhibit E.

### **III. SUMMARY OF ACTIVITIES DURING THE APPLICATION PERIOD**

On October 18, 2022, the Receiver filed her *Receiver's Fifth Report* (the "Report") (Doc. No. 303), which details the activity in this Case for the Application Period. The Receiver and her professionals devoted substantial time and effort to working with investors as to the amounts of their allowed claims, reviewing emails and documents provided to the Receiver, resolving claims against Southport Capital, and liquidating Receivership assets.

A summary of the information in the Report is included here.

#### **A. Investigations as to Assets and Asset Recovery**

The Report includes as an attachment a summary of the assets identified and their actual or estimated values as well as information about any applicable liens. The Receiver's activities as to asset analysis and recovery during the Application Period are summarized as follows:

- During the Application period, the Receiver mailed claim notices to all investors who records show received less back from Horizon than they invested and responded to numerous calls, emails, proofs of claim, and letters from

investors. The Receiver also sent memoranda to Horizon investors who records show either received more back from Horizon than they invested or who received back the same amount that they invested.

- The Receiver proposed that the Court approve the net investment method for calculating distributions to investors and appeared at the telephonic hearing that the Court conducted on that motion.

- The Receiver filed a motion to disallow any claim for certain investors who appeared to have closed their Horizon accounts before the Receivership case was initiated.

- During the Application Period, the Receiver reviewed claims submitted by creditors of Southport Capital in accordance with the Court's Order approving a claims process for those creditors and filed motions relative to those claims.

- The Receiver's team reviewed voluminous documents, in both electronic and hard copy form that were turned over by Southport Capital or otherwise provided to the Receiver.

- The Receiver's team continued efforts toward liquidating Horizon's assets, including obtaining an Order approving the interests held by the Receivership in three, related limited liability companies that own real property in

Chattanooga, Tennessee.

B. Receipts and Disbursements

The Receiver attached a ledger report on the Receivership Account as Exhibit A to the Report. As of the end of the Application Period, the balance in that account was \$17,574,051.50, no portion of which was encumbered. The sale funds account held proceeds derived from Southport Capital totaling \$162,297.02, reflecting the balance after all allowed claims against Southport Capital had been paid.

C. Investor Communications

The Receiver received numerous inquiries from investors in response to claim notices sent to them and responded promptly to questions and concerns. Stretto, Inc. provided noticing services to investors and others and maintained the website for the Receivership ([horizonreceivership.com](http://horizonreceivership.com)).

D. Receivership Operations

The focus during the Application Period was on determining the appropriate allowed amounts for investors' claims. As a result of responses to the claims notices that were mailed on July 8, 2022, the Receiver and her accountant collapsed certain related accounts into one; adjusted certain claim amounts; and corrected a few errors that were identified.

Throughout the Application Period, the Receiver's team continued the work of reviewing documents and emails that were turned over by Southport Capital and other sources that began before this Application Period.

E. Claims Held by the Receivership Estate

The Receiver has some indication of claims against third parties that the Receivership Estate may hold but has not determined which, if any, such claims would be appropriate to bring.

F. Status of Investor Claim Procedures

As noted above, the investor claims process was a focus of the Receiver's time and energy throughout the Application Period. The Receiver believes that all but one investor claim had been resolved as of the close of the Application Period.

G. Forecast

Certain payments are due to the Receivership Estate in 2023, including one that is due on December 31, 2023. Meanwhile, the Receiver's periodic reports will keep the Court and investors apprised of her best estimate of the progress of the Receivership and when she anticipates that this Case may be closed.

**IV. COMPENSATION REQUESTED**

This is an interim request for compensation. The Application Period encompassed a critical stage in the Receivership in that the allowed amounts of

investor claims were determined, the distribution method was approved, and progress was made toward potentially identifying litigation claims. Asset analysis and asset disposition remained a focus as well. The Receiver has taken care to assign legal work to control the cost to the Receivership Estate. Further, given the nature of certain tasks, the Receiver and her counsel have billed those activities at half their normal rate.

The fees requested reflect the actual hours worked by the Receiver and GWM charged at the hourly rates in effect at the time when the services were rendered (or in some cases, at 50% of normal hourly rates), less a 5% discount. Those rates take into account all relevant circumstances and factors as set out in the North Carolina Code of Professional Responsibility and the SEC Guidelines, including the nature of the services performed, the amount of time spent, the experience and ability of the professionals working on this Case, the novelty and complexity of the specific issues involved, the time limitations imposed by the circumstances, and the responsibilities undertaken by the Receiver and GWM under the Receivership Order.

The expense reimbursement requested reflects the actual and necessary expenses of the Receivership Estate, billed in accordance with the SEC Guidelines. Expenses during the Application Period were significant, primarily due to the one-



time cost of copying Southport Capital computers.

The services rendered thus far by the Receiver and GWM fall into four categories, totaling 348.2 hours:

- Asset Analysis and Recovery, 50.5 hours;
- Asset Disposition, 35.9 hours;
- Case Administration, 68.3 hours; and
- Claims Administration and Objections, 193.5 hours.

GWM's summary of the fees and expenses for the Application Period is as follows:

<b>Professional</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
A. Cotten Wright (ACW)	105.4 @	\$400.00	\$42,160.00
A. Cotten Wright (ACW) [50% Rate]	73.6 @	\$200.00	\$14,720.00
Anna S. Gorman (ASG)	42.4 @	\$360.00	\$15,264.00
Michael L. Martinez (MLM)	57.2 @	\$350.00	\$20,020.00
Michael L. Martinez (MLM) [50% Rate]	29.0 @	\$175.00	\$5,075.00
Brittany L. Franklin (BLF)	7.7 @	\$175.00	\$1,347.50
Summer Clerk (SC)	30.7 @	\$100.00	\$3,070.00
Stephanie Miller (SM)	1.7 @	\$125.00	\$212.50
Joseph W. Grier, III (JOE)	0.5 @	\$600.00	\$300.00
<b>Total Hours and Fees:</b>	348.2		\$102,169.00
<b>Less 5%</b>			
<b>Total Requested</b>			\$97,060.55
<b>Expenses:</b>			\$ 1,995.84
<b>Total Fees and Expenses:</b>			<b>\$99,056.39</b>

The SEC Guidelines limit the compensation and expense reimbursement

available to the Receiver to thirty percent (30%) of any net recovery. The Receiver respectfully requests that this Application be approved given that the amount requested falls well below that 30% limit.

#### **V. THE APPLICATION SHOULD BE ALLOWED**

The Receiver's compensation and that of her professionals may be determined at the Courts discretion. Courts consider factors such as the complexity of the Case, the benefit of the services to the Receivership Estate, the quality of the work performed, and the time records provided when ruling on an application for compensation and reimbursement of expenses. *SEC Fifth Ave. Coach Lines*, 364 F.Supp. 1220, 1222 (S.D.N.Y. 1973); *see also SEC v. Elliott*, 953 F.2d 1560, 1577 (11<sup>th</sup> Cir. 1992) (per curiam) (the receiver is entitled to compensation if the receiver reasonably discharges the receiver's duties, and the circumstances surrounding the receivership, including the results, are relevant).

Here, the Receiver and GWM respectfully submit that the services for which they seek compensation were necessary for, and beneficial to, the orderly administration of the Receivership Estate.

WHEREFORE, the Receiver prays that the Court will enter an Order:

- 1) Allowing GWM's requested professional fees in the amount of \$97,060.55;
- 2) Allowing GWM's requested reimbursement of expenses in the

amount of \$1,995.84; and

- 3) Granting such further relief as is just and proper.

This is the 19<sup>th</sup> day of October, 2022.

/s/ A. Cotten Wright

A. Cotten Wright (State Bar No. 28162)

Grier Wright Martinez, PA

521 E. Morehead St., Ste. 440

Charlotte, North Carolina 28202

Phone: 704.375.3720

Fax: 704.332.0215

[cwright@grierlaw.com](mailto:cwright@grierlaw.com)

/s/ W. Russell Patterson, Jr.

W. Russell Patterson, Jr. (GA Bar No.

566920) Local Counsel for Receiver

Ragsdale Beals Seigler Patterson & Gray, LLP

229 Peachtree St., NE, Suite 2400 Atlanta, GA

30303-1629

(404) 588-0500

[wrpjr@rbspg.com](mailto:wrpjr@rbspg.com)

Exhibits:

- Exhibit A – Receiver’s Certification
- Exhibit B - Standardized Fund Accounting Report for the Application Period
- Exhibit C – Summary of Prior Fee Application’s
- Exhibit D - GWM’s Fee Schedule for the Application Period
- Exhibit E - GWM’s invoice for the Application Period
- Exhibit F – Summary of GWM expenses for the Application Period

**EXHIBIT A**

**Receiver's Certification**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**v.**

**JOHN J. WOODS, ET AL.,**

**Defendants,**

Civil Action No.  
1:21-cv-3413-SDG

**RECEIVER'S CERTIFICATION FOR FIFTH APPLICATION FOR  
COMPENSATION TO GRIER WRIGHT MARTINEZ, PA,  
ATTORNEYS FOR THE RECEIVER**

A. Cotten Wright, the Receiver for the estates of the Receivership Defendants herein, hereby certifies as follows with respect to the *Fifth Application for Compensation to Grier Wright Martinez, PA, Attorneys for the Receiver* and the invoice attached thereto as Exhibit D:

1. This Certification is made in compliance with the Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission (the "SEC Guidelines").

2. I am an attorney licensed to practice law in the State of North Carolina and the United States District Court for the Western District of North Carolina. I am a member of the law firm of Grier Wright Martinez, PA (“GWM”).

3. I have read and am familiar with GWM’s application for compensation and reimbursement of expenses for the period of July 1, 2022 through September 30, 2022 (the “Application”). To the best of my knowledge, information and belief formed after reasonable inquiry, the Application and all fees and expenses set forth therein are true and accurate and comply with the SEC Guidelines.

4. All fees contained in the Application are based on the rates listed in the GWM’s fee schedule to the Application as Exhibit C less a 5% discount, and such fees are reasonable, necessary and commensurate with the skill and experience required for the activity performed. In certain instances, fees were billed at fifty percent (50%) due to the nature of the tasks performed.

5. GWM has not included in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay in any request for expense reimbursement.

6. In seeking reimbursement for a service which the GWM justifiably purchased or contracted for from a third party (such as copying, imaging, bulk

mail, messenger service, overnight courier, computerized research, or title and lien searches), GWM requests reimbursement only for the amount billed to GWM by the third-party vendor and paid by GWM to such vendor.

7. The Receiver and GWM professionals recorded time for all services provided in increments of one-tenth of an hour.

8. GWM does not seek payment for time spent preparing the Application or any documentation in support of the same.

This is the 19<sup>th</sup> day of October, 2022.

/s/ A. Cotten Wright  
A. Cotten Wright  
Receiver



**EXHIBIT B**

**Standardized Fund Accounting Report for the Application Period**

STANDARDIZED FUND ACCOUNTING REPORT  
for Horizon Private Equity III, LLC Receivership - Cash Basis  
Receivership; 1:21-cv-3413-SDG  
Reporting Period 07/01/2022 to 09/30/2022

FUND ACCOUNTING				
		Detail	Subtotal	Grand Total
Line 1	Beginning Balance (As of 07/01/2022)			20,178,502.55
	<i>Increases in Fund Balance:</i>			
Line 2	Business Income			
Line 3	Cash and Securities			
Line 4	Interest/Dividend Income			
Line 5	Business Asset Liquidation (Exhibit 1)	301,137.99		
Line 6	Personal Asset Liquidation			
Line 7	Third-Party Litigation Income			
Line 8	Miscellaneous - Other			
	Total Funds Available (Lines 1-8):		301,137.99	301,137.99
	<i>Decreases in Fund Balance:</i>			
Line 9	Disbursements to Investors			
Line 10	Disbursements to Receivership Operations			
Line 10a	Disbursements to Receiver or Other Professionals	172,247.66		
Line 10b	Business Asset Expenses (Exhibit 1)	2,571,044.36		
Line 10c	Personal Asset Expenses			
Line 10d	Investment Expenses			
Line 10e	Third-Party Litigation Expenses			
	1. Attorney Fees			
	2. Litigation Expenses			
	Total Third-Party Litigation Expenses		2,743,292.02	2,743,292.02
Line 10f	Tax Administrator Fees and Bonds			
Line 10g	Federal and State Tax Payments			
	Total Disbursements for Receivership Operations		2,743,292.02	2,743,292.02
Line 11	Disbursements for Distribution Expenses Paid by the Fund:			
Line 11a	Distribution Plan Development Expenses			
	1. Fees:			
	Fund Administrator			
	Independent Distribution Consultant (IDC)			
	Distribution Agent			
	Consultants			
	Legal Advisers			
	Tax Advisers			
	2. Administrative Expenses			
	3. Miscellaneous			
	Total Plan Development Expenses			
Line 11b	Distribution Plan Implementation Expenses:			
	1. Fees:			
	Fund Administrator			
	Independent Distribution Consultant (IDC)			
	Distribution Agent			
	Consultants			
	Legal Advisers			
	Tax Advisers			
	2. Administrative Expenses			
	3. Investor Identification			
	Notice Publishing Approved Plan			
	Claimant Identification			
	Claims Processing			
	Web Site Maintenance/Call Center			
	4. Fund Administrator Bond			
	5. Miscellaneous			
	6. Federal Account for Investor Restitution			
	(FAIR) Reporting Expenses			
	Total Plan Implementation Expenses			
	Total Disbursements for Distribution Expenses Paid by the Fund			-
Line 12	Disbursement to Court/Other			
Line 12a	Investment Expenses/Court Registry Investment			
	System (CRIS) Fees			
Line 12b	Federal Tax Payments			
	Total Disbursements to Court/Other			

STANDARDIZED FUND ACCOUNTING REPORT  
for Horizon Privite Equity III, LLC Receivership - Cash Basis  
Receivership; 1:21-cv-3413-SDG  
Reporting Period 07/01/2022 to 09/30/2022

	Total Funds Disbursed (Lines 9-11)			2,743,292.02
Line 13	Ending Balance (As of 09/30/2022 )			17,736,348.52

Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash & Cash Equivalents (Exhibit 1)			
Line 14b	Investments			
Line 14c	Other Assets or Uncleared Funds			
	Total Ending Balance of Fund - Net Assets			-

## Other Supplemental Information

		Detail	Subtotal	Grand Total
Line 15	Report of Items NOT to Be Paid by the Fund			
Line 15a	Disbursements for Plan Administration Expenses Not Paid by the Fund			
	Plan Development Expenses Not Paid by the Fund:			
	1. Fees:			
	Fund Administrator			
	IDC			
	Distribution Agent			
	Consultants			
	Legal Advisors			
	Tax Advisors			
	2. Administrative Expenses			
	3. Miscellaneous			
	Total Plan Development Expenses Not Paid by the Fund			
Line 15b	Plan Implementation Expenses Not Paid by the Fund			
	1. Fees:			
	Fund Administrator			
	IDC			
	Distribution Agent			
	Consultants			
	Legal Advisors			
	Tax Advisors			
	2. Administrative Expenses			
	3. Investor Identification			
	Notice/Publishing Approved Plan			
	Claimant Identification			
	Claims Processing			
	Web Site Maintenance/Call Center			
	4. Fund Administrator Bond			
	5. Miscellaneous			
	6. FAIR Reporting Expenses			
	Total Plan Implementation Expenses Not Paid by the Fund			
Line 15c	Tax Administrator Fees & Bonds Not Paid by the Fund			
	Total Disbursements for Plan Administration Expenses Not Paid by the Fund			
Line 16	Disbursements to Court/Other Not Paid by the Fund			
Line 16a	Investment Expenses/CRIS Fees			
Line 16b	Federal Tax Payments			
	Total Disbursements to Court/Other Not Paid by the Fund			
Line 17	DC & State Tax Payments			
Line 18	No. of Claims			
Line 18a	# of Claims Received This Reporting Period			
Line 18b	# of Claims Received Since Inception of Fund			
Line 19	No. of Claimants/Investors			
Line 19a	# of Claimants/Investors Paid This Reporting Period			
Line 19b	# of Claimants/Investors Paid Since Inception of Fund			

Receiver

By: \_\_\_\_\_

A. Cotten Wright  
(printed name)

Receiver  
(title)

Date: \_\_\_\_\_

STANDARDIZED FUND ACCOUNTING REPORT  
for Horizon Private Equity III, LLC Receivership - Cash Basis  
Receivership; 1:21-cv-3413-SDG  
Reporting Period 07/01/2022 to 09/30/2022

Tri State Capital Bank  
Checking xxxxxx7607

DETAIL OF LINE 5, Business Asset Liquidation

<u>Description</u>	<u>Amount</u>	<u>Total</u>
CBL Properties - Purchase BI Development	33,500.00	
CBL Properties - Purchase BI Development II	57,800.00	
CBL Properties - Purchase BI Development III	8,700.00	
Croft & Bender Fund - Distribution from fund	51,759.83	
US Sampleworks - Purchase of interest in US Sampleworks	2,500.00	
US Sampleworks - Purchase of interest in US Sampleworks	2,500.00	
Provident Trust Group - Distribution from fund	999.98	
First Horizon Bank - Refund on mortgage for GA condo	122.83	
Southport Distribution - Estate of Horizon Private Equity	17,005.35	
		<u>174,887.99</u>

DETAIL OF LINE 10a, Disbursements to Receiver or Other Professionals

<u>Description</u>	<u>Amount</u>	<u>Total</u>
Great Neck Realty - Professional Fees Real Estate Advisor	12,041.25	
Ragsdale Beals Seigler Patterson & Gray, LLP - Receivers attorney fees	3,143.50	
Ragsdale Beals Seigler Patterson & Gray, LLP - Receivers attorney expenses	8.55	
Middleswarth, Bowers & Co, LLP - Accountant Fees	48,289.80	
Middleswarth, Bowers & Co, LLP - Accountant Expenses	7,510.01	
Grier Wright Martinez, PA - Attorneys Fees, Receivers Firm	92,856.32	
Grier Wright Martinez, PA - Attorneys Expenses, Receivers Firm	7,898.23	
		<u>171,747.66</u>

DETAIL OF LINE 10b, Business Asset Expenses

<u>Description</u>	<u>Amount</u>	<u>Total</u>
Stretto - Service and consultant fees and expenses	24,958.83	
		<u>24,958.83</u>

DET

<u>Description</u>	<u>Total</u>
Tri State Capital Bank xxxxxx7607	<u>17,574,051.50</u>
(Account transferred to Tri State Capital Bank during reporting period)	

STANDARDIZED FUND ACCOUNTING REPORT  
for Horizon Private Equity III, LLC Receivership - Cash Basis  
Receivership; 1:21-cv-3413-SDG  
Reporting Period 07/01/2022 to 09/30/2022

Tri State Capital Bank  
Sale Funds Account xxxxxx7631

DETAIL OF LINE 5, Business Asset Liquidation

<u>Description</u>	<u>Amount</u>	<u>Total</u>
Smith Gambrell & Russell - Settlement with Clay Parker	125,000.00	
Meridian Wealth Management, LLC - Reimbursement for half of escrow fee	1,250.00	
		<u>126,250.00</u>

DETAIL OF LINE 10a, Disbursements to Receiver or Other Professionals

<u>Description</u>	<u>Amount</u>	<u>Total</u>
Jennifer Greene - Fees and Expenses Southport Capital Issues	500.00	
		<u>500.00</u>

DETAIL OF LINE 10b, Business Asset Expenses

<u>Description</u>	<u>Amount</u>	<u>Total</u>
Metropolitan Commerical Bank - Bank Service Fees	550.00	
Invicta Partners, LLC - Storage fees	5,829.50	
Invicta Partners, LLC - Storage fees	2,875.80	
Metropolitan Commerical Bank - Credit for Bank Service Fees	(550.00)	
Metropolitan Commerical Bank - Bank Service Fees	550.00	
Metropolitan Commerical Bank - Credit for Bank Service Fees	(550.00)	
Invicta Partners, LLC - Storage fees	2,730.96	
Steven J Rosenwasser/Greenberg Traurig, LLP - Southport Distribution	1,543,396.48	
Steven J Rosenwasser/Greenberg Traurig, LLP - Southport Distribution	1,250.00	
Smith, Gambrell & Russell - Southport Distribution	130,065.11	
Taylor English Duma, LLP - Southport Distribution	79,937.68	
TJ Bender & Company, Inc - Southport Distribution	130,000.00	
Devin M McGilloway, Inc - Southport Distribution	149,051.21	
James Wallace Woods - Southport Distribution	20,034.01	
Wealth Management Group - Southport Distribution	388,909.43	
Vital Records Control - Southport Distribution	44.52	
Summit Properties, LLC - Southport Distribution	40.85	
Arthur T Brown Jr - Southport Distribution	46,790.40	
Peace Communications, LLC - Southport Distribution	6,961.82	
Savvy Retirement Plans, Inc - Southport Distribution	700.82	
James Wallace Woods - Southport Distribution	16,018.92	
Telemet America - Southport Distribution	3,746.49	
Estate of Horizon Private Equity - Southport Distribution	17,005.35	
Invicta Partners, LLC - Southport Distribution	696.18	
		<u>2,546,085.53</u>

DE1

<u>Description</u>	<u>Total</u>
Tri State Capital Bank xxxxxx7631	<u>162,297.02</u>
(Account transferred to Tri State Capital Bank during reporting period)	

**EXHIBIT C**  
Summary of Prior Fee Applications

<b>Document</b>	<b>Interim Fee Application Date and Doc. No.</b>	<b>Period Covered</b>	<b>Fees Requested/Allowed</b>	<b>Expenses Requested/Allowed</b>	<b>Order Approving Interim Application</b>
1 <sup>st</sup> Interim	11/03/2021 Doc. No. 91	9/1/2021 – 9/30/2021	\$88,074.97	\$5,215.78	Doc. No. 105 12/02/2021
2 <sup>nd</sup> Interim	01/20/2022 Doc. No. 132	10/1/2021- 12/31/2021	\$128,783.90	\$15,306.37	Doc. No. 153 2/14/2022
3 <sup>rd</sup> Interim	04/22/2022 Doc. No. 189	1/1/2022- 3/31/2022	\$83,594.30	\$3,193.13	Doc. No. 207 5/13/2022
4 <sup>th</sup> Interim	07/25/2022 Doc. No. 243	4/1/2022- 6/30/2022	\$92,856.32	\$7,898.23	Doc. No. 273 8/18/2022

**EXHIBIT D**

<b>Grier Wright Martinez, PA Fee Schedule Attorney</b>	<b>Code</b>	<b>Position</b>	<b>Year Licensed</b>	<b>Hourly Rate</b>
Joseph W. Grier, III	JWG	Member	1977	\$600
A. Cotten Wright	ACW	Member	2001	\$400
Anna S. Gorman	ASG	Staff Attorney	1994	\$360
Michael L. Martinez	MLM	Member	2009	\$350
A. Cotten Wright as Receiver	CWT	Receiver	2001	\$0
Brittany L. Franklin	BLF	Paralegal		\$175
Stephanie Miller	SM	Legal Assistant		\$125
Summer Associate	SC	Clerk		\$100

**EXHIBIT E**

**Grier Wright Martinez, PA  
Invoice for Application Period**





## Grier Wright Martinez, PA

521 E. Morehead St., Suite 440  
Charlotte, NC 28202  
United States  
Phone: (704) 375-3720  
www.grierlaw.com

## STATEMENT

Statement # 766  
Date: 10/19/2022  
Due On: 11/07/2022

A Cotten Wright

**21-10168/Wright**

### Horizon Private Equity III, LLC Receivership

Date	Notes	Attorney	Quantity	Rate	Total
07/01/2022	CASE ADMINISTRATION: Continued researching database for sheet terms.	SC	3.40	\$100.00	\$340.00
07/01/2022	CASE ADMINISTRATION: Review draft quarterly report for second quarter of 2022. Provide feedback to ACW re the same.	MLM	1.10	\$350.00	\$385.00
07/05/2022	CASE ADMINISTRATION: Continued researching select terms in document database.	SC	3.00	\$100.00	\$300.00
07/05/2022	CASE ADMINISTRATION: Emails with John Chapman re further requests for documents.	MLM	0.20	\$350.00	\$70.00
07/05/2022	CASE ADMINISTRATION: Receive call from S. Stallings, accountant, regarding questions about sale of Birchwood II, LLC interest.	ASG	0.20	\$360.00	\$72.00
07/05/2022	ASSET DISPOSITION: Correspondences with M. Mashburn regarding closing on Vinings Office Condo and funds he still has in trust. Review closing statement and opine that it may be the appraisal fee due to bank.	ASG	0.30	\$360.00	\$108.00
07/05/2022	ASSET DISPOSITION: Correspondences with B. Hauk regarding BI entity sales, Clint Wolford negotiations.	ASG	0.10	\$360.00	\$36.00

07/05/2022	ASSET DISPOSITION: Review settlement agreement with Southport Capital and IBERIABANK to compute payment to IBERIABANK.	MLM	0.20	\$350.00	\$70.00
07/05/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Conduct further analyses comparing rising tide distribution outcomes with net investment distribution outcomes. Conference ACW re the same.	MLM	1.50	\$350.00	\$525.00
07/05/2022	CASE ADMINISTRATION: Detailed review and updates to Receiver's Fourth Report to the Court specifically updating the status of Receivership Assets.	ASG	0.80	\$360.00	\$288.00
07/05/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed and responded to emails from A.Smith re: receipt of \$5000 check to First Horizon Bank for settlement as to claim for attorneys' fees; distribution of portion of Southport Capital sale proceeds in accordance with settlement. Drafted cover letter for settlement payment.	ACW	0.50	\$400.00	\$200.00
07/05/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Compared list of claimants on summary of investor activity with list from Provident Trust. [50% Discount]	ACW	2.40	\$200.00	\$480.00
07/05/2022	CASE ADMINISTRATION: Compiled a list of Logikcull search terms and results.	SC	2.30	\$100.00	\$230.00
07/05/2022	CASE ADMINISTRATION: Reviewed and responded to email from M.Bowers re: quarterly accounting. Reviewed edits to draft Receiver's Fourth Report prepared by ASG. Reviewed draft report and made additional edits.	ACW	1.30	\$400.00	\$520.00
07/06/2022	CASE ADMINISTRATION: Started working on a research memo summarizing search results.	SC	3.40	\$100.00	\$340.00
07/06/2022	ASSET DISPOSITION: Correspondences with B. Hauk regarding status of outstanding Sale Agreement and execution timing of same.	ASG	0.10	\$360.00	\$36.00
07/06/2022	CASE ADMINISTRATION: Emails with Tony Cochran, Alex Khoury, Gerald Kline, H.B. Roback, Graham Loomis, Emily Ward, and ACW re preservation of Southport Capital records.	MLM	0.10	\$350.00	\$35.00
07/06/2022	CASE ADMINISTRATION: Review analysis from Ed Bowers re certain investor accounts. Emails with BLF and ACW re the same.	MLM	0.30	\$350.00	\$105.00
07/07/2022	CASE ADMINISTRATION: Continued working on research memo re: search results.	SC	3.00	\$100.00	\$300.00
07/07/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed spreadsheets re: impact of rising tide distribution method in this case. Worked on motion for approval of distribution method and procedure.	ACW	2.80	\$400.00	\$1,120.00

07/08/2022	CASE ADMINISTRATION: Continued working on research memo.	SC	3.00	\$100.00	\$300.00
07/08/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed claim forms for investors in preparation for mailing same.	ACW	0.30	\$400.00	\$120.00
07/08/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Worked on memorandum of law in support of motion for approval of distribution method and procedure. Edited motion regarding distribution method.	ACW	3.60	\$400.00	\$1,440.00
07/08/2022	CASE ADMINISTRATION: Reviewed email from L.Burnette and edited draft Receiver's Fourth Report. Filed report electronically.	ACW	0.30	\$400.00	\$120.00
07/11/2022	CASE ADMINISTRATION: Continued work on memo summarizing research results.	SC	3.00	\$100.00	\$300.00
07/11/2022	CASE ADMINISTRATION: Reviewed email from E.Bowers re: Horizon trading accounts with Oppenheimer. Brief conference with BLF re: documents provided by SEC. Sent email to H.Roback requesting 1099s on Horizon trading accounts with Oppenheimer.	ACW	0.30	\$400.00	\$120.00
07/11/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Took call from investor re: notice re: address update; verified current address for investor. [50% Discount]	ACW	0.10	\$200.00	\$20.00
07/11/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Continued work on motion and brief regarding proposed distribution method.	ACW	3.40	\$400.00	\$1,360.00
07/11/2022	ASSET DISPOSITION: Receive call R. Tramantano. Receive, review and provide input into real property report of Great Neck Realty re BI Properties.	ASG	0.40	\$360.00	\$144.00
07/11/2022	CASE ADMINISTRATION: Conference with ACW re: Oppenheimer documents. Research documents provided by SEC re Oppenheimer.	BLF	0.20	\$175.00	\$35.00
07/12/2022	CASE ADMINISTRATION: Continued work on memo summarizing research results.	SC	3.20	\$100.00	\$320.00
07/12/2022	ASSET DISPOSITION: Send unexecuted Membership Sale Agreement and the draft Real Property Assessment to M. Bowers and request that he provide a business valuation of BI Developments, LLC, BI Developments II, LLC and BI Developments III, LLC to support Receiver's Motion to sell the Horizon interests in the same.	ASG	0.20	\$360.00	\$72.00
07/12/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed email from J.Demma re: inquiries regarding claim notices and sent response. Drafted Notice to investors re: claim notices mailing dates and related information.	ACW	0.90	\$400.00	\$360.00

07/12/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Returned call from investor asking when he would get Claim Notice. [50% Discount]	ACW	0.10	\$200.00	\$20.00
07/12/2022	CASE ADMINISTRATION: Emails and conferences with BLF re document preservation and processing. Emails with Stephen Council re the same.	MLM	0.30	\$350.00	\$105.00
07/12/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Continued work on pleadings re: distribution method.	ACW	1.70	\$400.00	\$680.00
07/12/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Review and edit draft letters to claimants further describing claims process.	MLM	0.20	\$350.00	\$70.00
07/12/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Revise rising tide spreadsheet. Emails with ACW re the same.	MLM	0.50	\$350.00	\$175.00
07/12/2022	ASSET DISPOSITION: Call with J. Curry of CBL regarding sale of membership interests in BI entities and process to have same approved. Call from J. Sveadas attorney for First Volunteer Bank regarding bank lien on underlying real property assets of BI entities and bank input on sale of membership interests.	ASG	0.50	\$360.00	\$180.00
07/13/2022	CASE ADMINISTRATION: Continued work on memo summarizing research results.	SC	3.10	\$100.00	\$310.00
07/13/2022	ASSET DISPOSITION: Discuss First Volunteer request for a claim with ACW. Legal research priority of claims of a Ponzi Scheme creditor vs. victim claims. Draft correspondence to J. Sveadas regarding same.	ASG	2.10	\$360.00	\$756.00
07/13/2022	ASSET DISPOSITION: Correspondences with J. Kelly regarding sale of interests in US Sampleworks, LLC.	ASG	0.10	\$360.00	\$36.00
07/13/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Worked on brief regarding distribution method.	ACW	1.20	\$400.00	\$480.00
07/14/2022	CASE ADMINISTRATION: Completed memo summarizing research results.	SC	3.30	\$100.00	\$330.00
07/14/2022	ASSET DISPOSITION: Correspondences with J. Curry regarding escrow deposit for BI entity interests. Call from R. Tramantano about timing of real estate valuation report. Call with M. Bowers regarding background for business valuation report on BI entity interests.	ASG	0.80	\$360.00	\$288.00
07/14/2022	ASSET ANALYSIS & RECOVERY: Receive and review Q2 financial letter on status of Dynamo Fund, I, LP, forward to M. Bowers.	ASG	0.20	\$360.00	\$72.00
07/14/2022	CASE ADMINISTRATION: Conference call with H.B. Roback, Erin East, Tiffany Kunkle, Ed Bowers, and ACW re forensic accounting analysis and discovery issues. Follow-up conference with ACW re the same.	MLM	2.10	\$350.00	\$735.00

	<p>Emails with Jeff Boujoukos, Zoe Phillips, and ACW re the same. Review draft settlement documents re S.E.C. and Southport Capital. Emails with Gerald Kline, Tony Cochran, and ACW re the same.</p>				
07/14/2022	CASE ADMINISTRATION: Conference call with H.Roback, E.East, T.Kunkle, E.Bowers, and MLM re: accounting analysis; Oppenheimer production; Southport Capital issues. Follow-up conference with MLM re same.	ACW	1.00	\$400.00	\$400.00
07/14/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Continued work on brief regarding distribution method.	ACW	2.60	\$400.00	\$1,040.00
07/14/2022	CASE ADMINISTRATION: Reviewed revised version of accounting for investors accounts. Drafted Receiver's Amended Report of Final Accounting.	ACW	1.50	\$400.00	\$600.00
07/15/2022	CASE ADMINISTRATION: Conference ACW re upcoming FINRA arbitration hearing. Draft letter to FINRA arbitration panel re the same. Emails with Nirvana Bissessar, Matt Wolper, Jeff Boujoukos, Kristin Patton, and ACW re the same.	MLM	1.50	\$350.00	\$525.00
07/15/2022	CASE ADMINISTRATION: Review draft motion to extend discovery. Provide comments to ACW re the same.	MLM	0.10	\$350.00	\$35.00
07/15/2022	CASE ADMINISTRATION: Edited amended final accounting and emailed same to L.Burnette for review.	ACW	0.50	\$400.00	\$200.00
07/15/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Review draft motion for order approving distribution method and procedure.	MLM	0.40	\$350.00	\$140.00
07/15/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Took call from investor inquiring as to claim notice. [50% Discount]	ACW	0.10	\$200.00	\$20.00
07/15/2022	CASE ADMINISTRATION: Reviewed draft letter to N.Bissessar re: FINRA matter - Hatfiled v. Oppenheimer.	ACW	0.30	\$400.00	\$120.00
07/15/2022	CASE ADMINISTRATION: Conference SC1 and ACW re review of documents.	MLM	0.60	\$350.00	\$210.00
07/15/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Responded to investor calls requesting general information about claim forms. [50% Discount]	ACW	0.20	\$200.00	\$40.00
07/15/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed email from investors requesting copy of details relative to their accounts. Researched details and prepared document showing same. [50% Discount]	ACW	0.30	\$200.00	\$60.00
07/15/2022	ASSET DISPOSITION: Reviewed email from J.Svedas re: First Volunteer Bank's waiver of a claim based on Horizon's guaranty of loans on BI Development projects	ACW	0.20	\$400.00	\$80.00

	and sent response.				
07/15/2022	CASE ADMINISTRATION: Reviewed email from L.Burnette re: amended final accounting. Prepared report of amended final accounting & exhibit and filed same electronically. Served updated Horizon Transactions Combined spreadsheet on defense counsel. Requested BLF serve spreadsheet on SEC.	ACW	0.30	\$400.00	\$120.00
07/15/2022	CASE ADMINISTRATION: Review transaction combined spreadsheet. Sent to SEC.	BLF	0.10	\$175.00	\$17.50
07/16/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Review and edit draft motion for order approving distribution method and procedure and brief in support thereof. Emails with ACW re the same.	MLM	1.20	\$350.00	\$420.00
07/18/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Returned calls to investors re: claim notices. [50% Discount]	ACW	0.20	\$200.00	\$40.00
07/18/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed emails and claim information from multiple investors. Took calls from investors re: amounts shown on claim forms. Researched accounting for each investor who inquired and printed ledgers for each account. Sent ledger information to investors by email. [50% Discount]	ACW	2.60	\$200.00	\$520.00
07/19/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Telephone call from ACW re discussions with investors concerning claims issues. Review emails between Ed Bowers and ACW re the same.	MLM	0.20	\$350.00	\$70.00
07/19/2022	CASE ADMINISTRATION: Telephone call from Matt McDonough re resolution of FINRA disclosure issues. Follow-up call with ACW re the same. Emails with Matt McDonough, Jeff Boujoukos, and ACW re the same.	MLM	0.60	\$350.00	\$210.00
07/19/2022	CASE ADMINISTRATION: Conference call with Tony Cochran, Gerald Kline, and ACW re settlement between Southport Capital and the S.E.C. Follow-up call with ACW re the same.	MLM	0.50	\$350.00	\$175.00
07/19/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed claim against Southport Capital submitted by Peace Communications. Sent email to J.Greene requesting information re: same.	ACW	0.20	\$400.00	\$80.00
07/19/2022	CASE ADMINISTRATION: Call with A.Cochran, G.Kline, and MLM re settlement between SEC and Southport Capital. Follow-up call with MLM re: same. Reviewed redline comments to proposed order on settlement and sent response to G.Kline.	ACW	0.70	\$400.00	\$280.00
07/19/2022	CASE ADMINISTRATION: Call with E.Bowers re: his review of exceptions noted by SEC; investor accounts	ACW	0.20	\$400.00	\$80.00

	that appear to have been closed out.				
07/19/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed edits to motion and brief on distribution method provided by MLM. Prepared revisions to motion and brief and drafted supporting affidavit. Emailed draft documents to H.Roback and L.Burnette for review.	ACW	2.10	\$400.00	\$840.00
07/19/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Took calls and responded to emails from investors regarding claim notices. Provided detailed information relative to each claim. [50% Discount]	ACW	1.10	\$200.00	\$220.00
07/19/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Research Logickull re investor claim. Conference ACW re same.	BLF	0.30	\$175.00	\$52.50
07/20/2022	ASSET DISPOSITION: Reviewed report prepared by R.Tramantano re: real property owned by BI Development, BI Development II, and BI Development III. Call to M.Bowers re: his assessment of value of the interests held by the Receivership Estate in those entities	ACW	0.20	\$400.00	\$80.00
07/20/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed email from D.Greene re: claim by his clients against Southport Capital; claim notice relative to claim against Receivership Estate. Drafted reply to email re: my position as to investors' claim against Southport Capital; allowable amount of their claim against the Receivership Estate. Reviewed response from D.Greene withdrawing claim against Southport Capital and sent reply.	ACW	0.20	\$400.00	\$80.00
07/20/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed and responded to email from A.Moskowitz re: determination of distribution method.	ACW	0.10	\$400.00	\$40.00
07/20/2022	CASE ADMINISTRATION: Took call from H.Roback re: question regarding service of motion on claims against Southport Capital; issues related to Southport Capital.	ACW	0.10	\$400.00	\$40.00
07/20/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed and responded to multiple emails from investors regarding allowable amounts of their claims and attempted to resolve same. [50% Discount]	ACW	0.80	\$200.00	\$160.00
07/21/2022	CASE ADMINISTRATION: Conference call with A.Khory, J. Wheeler, H.Roback, J.Greene and others re: Southport Capital's costs related to storage of Southport Capital's electronic files being stored by Invicta. Follow-up call with H.Roback.	ACW	1.00	\$400.00	\$400.00
07/21/2022	ASSET DISPOSITION: Reviewed report prepared by M.Bowers value of interests in BI Development, BI Development II, and BI Development III. Reviewed draft	ACW	1.80	\$400.00	\$720.00



	motion and brief for approval of sale, edited and completed the same. Emailed drafts to L.Burnette for review.				
07/21/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Took calls and responded to emails from investors regarding claim notices. Researched claim issues and sent responses. [50% Discount]	ACW	2.20	\$200.00	\$440.00
07/21/2022	CASE ADMINISTRATION: Began drafting ex parte motion for authority to pay Invicta invoices for storing Southport Capital electronic records.	ACW	0.70	\$400.00	\$280.00
07/22/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Returned calls from investors re: claim notices. Reviewed emails and proofs of claim from investors; reviewed emails from E.Bowers re: investors' questions. Researched various claims and sent replies to investor questions.	ACW	1.40	\$400.00	\$560.00
07/22/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Revised draft motion for authority to pay certain Southport Capital post-sale expenses.	ACW	1.20	\$400.00	\$480.00
07/23/2022	ASSET DISPOSITION: Emails with ACW re various claims submitted against Southport Capital. Research re the same.	MLM	0.60	\$350.00	\$210.00
07/24/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Began drafting motion and brief re: Class 3 claims against Southport Capital.	ACW	6.60	\$400.00	\$2,640.00
07/24/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Drafted affidavit in support of motion relative to Class 3 Administrative Claims against Southport Capital.	ACW	1.10	\$400.00	\$440.00
07/25/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Made additional edits to draft motion, brief, affidavit and proposed order regarding Class 3 Administrative Claims against Southport Capital. Emailed drafts to local counsel for review and comment.	ACW	0.90	\$400.00	\$360.00
07/25/2022	CASE ADMINISTRATION: Revised motion re: post-sale expenses of Southport Capital. Drafted memorandum of law, affidavit and proposed order on same.	ACW	2.30	\$400.00	\$920.00
07/25/2022	ASSET DISPOSITION: Revisions to Motion and Brief regarding sale of BI LLC interests. Discuss with ACW. Call with R. Tramantano. Correspondence to R. Tramantano and B. Hauk regarding same.	ASG	1.50	\$360.00	\$540.00
07/26/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Returned calls and responded to emails from investors re: claim notices. Provided detailed account information to investors at their requests. [50% Discount]	ACW	3.00	\$200.00	\$600.00
07/26/2022	ASSET DISPOSITION: Revisions to Motion and Brief	ASG	1.10	\$360.00	\$396.00



	regarding sale of BI, BI II and BI III LLC Interests.				
07/26/2022	CASE ADMINISTRATION: Reviewed draft consent motion and order emailed by M.McDonough. Revised both documents and sent redlines to M.McDonough. Emailed drafts to L.Burnette for review.	ACW	1.30	\$400.00	\$520.00
07/26/2022	CASE ADMINISTRATION: Reviewed email from L.Burnette re: consent motion and order on production of documents. Reviewed email from M.McDonough re: comments on drafts of consent motion and order. Finalized consent motion and order and filed same electronically.	ACW	0.60	\$400.00	\$240.00
07/26/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Research Logikcull re: investor claim. Conference ACW re findings.	BLF	0.40	\$175.00	\$70.00
07/27/2022	ASSET DISPOSITION: Call from B. Hauk regarding BI III, LLC history.	ASG	0.20	\$360.00	\$72.00
07/27/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Responded to investor calls and emails re: claim notices. Provided details on investor accounts to certain investors. [50% Discount]	ACW	2.20	\$200.00	\$440.00
07/27/2022	CASE ADMINISTRATION: Took call from H.Roback re: draft motion on distribution method; draft motion on post-sale expenses of Southport Capital; other pending matters.	ACW	0.20	\$400.00	\$80.00
07/27/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed motion on distribution method and drafted proposed order on same.	ACW	0.80	\$400.00	\$320.00
07/27/2022	CASE ADMINISTRATION: Review Motion on Post-Sale Expenses of Southport Capital and supporting documents. Draft Notice for Motion and send to L. Burnette for review. File Motion and supporting documentation.	BLF	0.30	\$175.00	\$52.50
07/28/2022	ASSET DISPOSITION: Call from B. Hauk regarding negotiations with C. Woford. Receive offer from C. Woford on various LLC interests, review files on those entities and historical analysis, discuss with ACW. Respond to offer by corresponding with B. Hauk.	ASG	0.70	\$360.00	\$252.00
07/28/2022	ASSET DISPOSITION: Receive and review updated valuation report from Great Neck, finalize sale pleadings and send to ACW for her review and input. Send draft pleadings with correspondence to HB Roback of the SEC for review and comment. Send pleadings to L. Burnette for review and comment.	ASG	1.40	\$360.00	\$504.00
07/28/2022	ASSET DISPOSITION: Receive notice of sale of asset in C&B Fund, upcoming distribution to LP's of Croft and Bender Fund, send wire instructions, calculate	ASG	0.60	\$360.00	\$216.00

	anticipated distribution to HPE.				
07/28/2022	ASSET DISPOSITION: Reviewed revised pleadings re: sale of interests in BI entities and made redlined edits to motion, brief and proposed order.	ACW	0.90	\$400.00	\$360.00
07/28/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed emails and voicemail messages from investors re: claims notices and responded. Made notes for follow up with E.Bowers as to certain accounts. Reviewed claims received by mail, drafted responses, and made notes for follow up with E.Bowers. [50% Discount]	ACW	0.80	\$200.00	\$160.00
07/28/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed motion on distribution method and drafted proposed order on same.	ACW	3.60	\$400.00	\$1,440.00
07/28/2022	CASE ADMINISTRATION: Review Motion on Distribution Method and supporting documents. Draft Notice for Motion on Distribution Method. Send to L. Burnette for review. File Motion and supporting documentation.	BLF	0.30	\$175.00	\$52.50
07/28/2022	CASE ADMINISTRATION: Review Motion for Allowance of Class 3 Admin Claims Against Southport Capital and supporting documents. Draft Notice for Motion and send to L. Burnette for review. File Motion and supporting documents.	BLF	0.40	\$175.00	\$70.00
07/29/2022	ASSET DISPOSITION: Correspondences with J. Curry regarding status of Motion to Approve Sale of BI LLC interests. Receive and respond to request for status on motion by J. Sveadas.	ASG	0.20	\$360.00	\$72.00
07/29/2022	CASE ADMINISTRATION: Telephone call to ACW re status of Oppenheimer & Co. issues.	MLM	0.20	\$350.00	\$70.00
07/29/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed and responded to emails from investors regarding claim notices and net winnings. Reviewed proofs of claim submitted by investors and prepared responses to same. [50% Discount]	ACW	2.60	\$200.00	\$520.00
07/29/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Receive and review claim of James Woods including review of voluminous legal invoices and Operating Agreements of Southport and Livingstone, discuss issues with ACW. Send questions to J. Stone about same.	ASG	1.50	\$360.00	\$540.00
07/29/2022	CASE ADMINISTRATION: Reviewed email from H.Roback re: draft judgment and consent for Southport Capital. Responded regarding text relative to collection and distribution of funds.	ACW	0.30	\$400.00	\$120.00
07/29/2022	CASE ADMINISTRATION: Reviewed email from A. Holland re: correspondence sent to chambers by an	ACW	0.10	\$400.00	\$40.00

	investor's daughter. Sent response.				
08/01/2022	ASSET DISPOSITION: Finalize documents regarding sale of BI Membership Interests in three LLCs, forward to BFL for filing. Send filed pleadings with correspondence to J. Curry, J. Sveadas, R. Tramantano, B. Hendrix, and B. Hauk.	ASG	0.70	\$360.00	\$252.00
08/01/2022	ASSET DISPOSITION: Confirm receipt of distribution from C&B private equity fund.	ASG	0.10	\$360.00	\$36.00
08/01/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Returned calls to investors re: questions about claim notices. Reviewed and responded to investor emails re: claim notices. [50% Discount]	ACW	2.80	\$200.00	\$560.00
08/01/2022	CASE ADMINISTRATION: Review emails with Alisha Holland, David Chaiken, ACW and others re ex parte communication with the Court by an investor's daughter.	MLM	0.20	\$350.00	\$70.00
08/01/2022	ASSET DISPOSITION: Receive counter proposal from J. Kelley on sale of interests in US Sampleworks, LLC. Discuss with ACW, update draft Redemption Agreement and correspondence to J. Kelley with proposal.	ASG	0.40	\$360.00	\$144.00
08/01/2022	CASE ADMINISTRATION: Emails with John Chapman re document production issues. Emails with Matt Wolper re the same.	MLM	0.10	\$350.00	\$35.00
08/01/2022	CASE ADMINISTRATION: Review Motion to sale BI Developments Interests and supporting documents. File the same.	BLF	0.20	\$175.00	\$35.00
08/01/2022	CASE ADMINISTRATION: Reviewed email from D. Chaiken to A. Holland taking the position that correspondence from an investor's daughter not be docketed.	ACW	0.10	\$400.00	\$40.00
08/02/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed voice mail messages and emails from investors regarding claim notices. Responded to same. Call with E.Bowers re: his review of certain accounts. [50% Discount]	ACW	4.80	\$200.00	\$960.00
08/02/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed emails from J.Greene re: monthly statement & invoice from Invicta for services provided to Southport Capital. Sent email to A.Cochran & A.Khoury re: same.	ACW	0.20	\$400.00	\$80.00
08/02/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Review draft response to certain investors re claims issues. Provide feedback to ACW re the same.	MLM	0.10	\$350.00	\$35.00
08/02/2022	CASE ADMINISTRATION: Returned call to H.Roback re: settlement with Southport Capital.	ACW	0.20	\$400.00	\$80.00

08/03/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed and responded to emails from investors re: claims notices. Took calls from investors re: same. Provided detailed information to investors regarding their Horizon accounts. Made corrections and adjustments as necessary. [50% Discount]	ACW	5.20	\$200.00	\$1,040.00
08/03/2022	ASSET DISPOSITION: Finalize agreement for redemption of US Sampleworks, LLC Membership Interests, send Agreement to J. Kelly along with wire instructions.	ASG	0.40	\$360.00	\$144.00
08/04/2022	ASSET DISPOSITION: Receive executed Redemption Agreement regarding US Sampleworks, LLC, correspondence with J. Kelly regarding next steps.	ASG	0.20	\$360.00	\$72.00
08/04/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed and responded to emails from investors re: claim notices. Researched and edited claim information as appropriate. Exchanged multiple emails with E.Bowers re: resolving issues with claims. [50% Discount]	ACW	2.60	\$200.00	\$520.00
08/04/2022	ASSET DISPOSITION: Call from B. Hauk regarding negotiations with C. Wolford regarding various LLC membership interests.	ASG	0.20	\$360.00	\$72.00
08/04/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Began review of Class 4 Claims against Southport Capital.	ACW	1.20	\$400.00	\$480.00
08/05/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed Class 4 Claims against Southport Capital and worked on motion and brief re: recommendations as to same.	ACW	1.40	\$400.00	\$560.00
08/05/2022	CASE ADMINISTRATION: Emails with Marc Fitapelli, Jeffrey Saxon, Jeff Boujoukos, Matt McDonough, Zoe Phillips, and ACW re possible production of documents to investor.	MLM	0.10	\$350.00	\$35.00
08/05/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed investor emails regarding claims. Exchanged emails with E.Bowers re: same. Reviewed and responded to proofs of claim from investors. Made any appropriate adjustments and responded to investors as to claims allowances. [50% Discount]	ACW	4.20	\$200.00	\$840.00
08/05/2022	CASE ADMINISTRATION: Telephone call to John Chapman re new subpoena received for testimony. Follow-up research re the same. Emails with John Chapman re the same.	MLM	1.00	\$350.00	\$350.00
08/08/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed voice mail messages from investors and returned calls, answering investor questions. Reviewed proofs of claim submitted by investors and responded to same. [50% Discount]	ACW	5.10	\$200.00	\$1,020.00

08/09/2022	ASSET ANALYSIS & RECOVERY: Receive and review Q2 reports for Dynamo Fund and compare to prior financials.	ASG	0.30	\$360.00	\$108.00
08/09/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed proofs of claims and inquiries regarding claims sent by investors. Corresponded with E.Bowers as to certain claim inquiries. Responded to investors regarding claims issues. [50% Discount]	ACW	3.90	\$200.00	\$780.00
08/09/2022	CASE ADMINISTRATION: Access 1099s sent by Oppenheimer & Co. Inc. Conferences with BLF re the same.	MLM	0.20	\$350.00	\$70.00
08/10/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Conference call with Adam Moskowitz, Robert Minkoff, and ACW re potential offer to purchase claims by ASM Capital. Follow-up call with ACW re the same.	MLM	0.40	\$350.00	\$140.00
08/10/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Continued work on pleadings regarding Class 4 claims against Southport Capital. Exchanged emails with J.Stone re: Class 4 claim submitted by Jim Woods.	ACW	1.60	\$400.00	\$640.00
08/10/2022	ASSET DISPOSITION: Reviewed and responded to email from D.Chaiken re: motion to sell interests in BI entities.	ACW	0.20	\$400.00	\$80.00
08/11/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Continued work on pleadings regarding Class 4 Claims against Southport.	ACW	2.80	\$400.00	\$1,120.00
08/11/2022	ASSET DISPOSITION: Receive correspondence D. Chaiken questioning Receiver's Motion to Sell the BI LLC Interests. Discuss with ACW. Draft Memo after detailed review of file on value of BI LLC Interests and forward to ACW.	ASG	1.10	\$360.00	\$396.00
08/11/2022	ASSET DISPOSITION: Reviewed email from D.Chaiken re: proposed sale of interests in BI entities. Brief conference with ASG. Responded to email from D.Chaiken suggesting conference call.	ACW	0.30	\$400.00	\$120.00
08/11/2022	ASSET DISPOSITION: Reviewed memo drafted by ASG summarizing re: facts and issues related to liquidating interests in BI entities.	ACW	0.20	\$400.00	\$80.00
08/11/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed investor claims sent by email and U.S. mail. Responded to same. [50% Discount]	ACW	1.80	\$200.00	\$360.00
08/12/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Made revisions to pleadings on Class 4 Claims against Southport.	ACW	1.00	\$400.00	\$400.00
08/12/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed proofs of claim submitted by investors and responded to same. Returned calls to investors re:	ACW	1.60	\$200.00	\$320.00

	claims questions. [50% Discount]				
08/12/2022	ASSET DISPOSITION: Call with D.Chaiken, S.Council & ASG re: motion for authority to liquidate interests in BI entities. Reviewed and responded to email from S.Council re: prior appraisals.	ACW	0.50	\$400.00	\$200.00
08/12/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed documentation re: claim against Southport by A.Brown.	ACW	0.30	\$400.00	\$120.00
08/12/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Sent email to J.Stone re: claim against Southport submitted by attorneys for Jim Woods; request for extension of time to object to claim. Reviewed response from J.Cobb re: attorneys' fees, indemnification agreement. Sent email to J.Cobb requesting a summary of attorneys' fees & expenses.	ACW	0.20	\$400.00	\$80.00
08/12/2022	CASE ADMINISTRATION: Returned call to H.Roback re: pending case matters.	ACW	0.30	\$400.00	\$120.00
08/12/2022	ASSET DISPOSITION: Conference call with S. Council, D. Chaiken, ACW regarding pending Motion related to sale of BI LLC Interests. Follow up meeting with ACW regarding same.	ASG	0.70	\$360.00	\$252.00
08/15/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Review and edit draft motion re: claim submitted by A. Brown and supporting brief, affidavit, and proposed order. Conferences with ACW re the same.	MLM	2.10	\$350.00	\$735.00
08/15/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Took investor calls and sent emails regarding claims information in response. [50% Discount]	ACW	0.20	\$200.00	\$40.00
08/15/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed investor lists to compile information re: deceased investors listed as net winners & investors whose accounts show no distributions. [50% Discount]	ACW	0.70	\$200.00	\$140.00
08/15/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Call with L.Duskin re: claim calculations and information for her client. [50% Discount]	ACW	0.20	\$200.00	\$40.00
08/15/2022	CASE ADMINISTRATION: Research Logikcull for appraisals and supporting documents for BI Developments properties. Conference ACW re findings.	BLF	0.40	\$175.00	\$70.00
08/16/2022	CASE ADMINISTRATION: Emails with Marc Fitapelli, Jeffrey Saxon, Jeff Boujoukos, Zoe Phillips, Matt McDonough, and ACW re production of documents to new set of claimants against Oppenheimer & Co., Inc.	MLM	0.20	\$350.00	\$70.00
08/16/2022	ASSET DISPOSITION: Receive request for information from S. Council regarding proposed sale of BI LLC interests. Pull and review historical information on those entities and the underlying real property and respond to	ASG	0.80	\$360.00	\$288.00

S. Councill.					
08/16/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Receive response from J. Cobb regarding questions about Claim submitted on behalf of James Woods. Review Complaint in Oppenheimer litigation which names James Woods individually and send more specific questions to J. Cobb regarding claim made.	ASG	0.40	\$360.00	\$144.00
08/16/2022	ASSET ANALYSIS & RECOVERY: RE Dynamo Fund. Receive correspondence B. Large regarding interested LP in HPE III interest in Dynamo Fund. Review historical documents on Fund lifespan, and correspondence to B. Large regarding procedure for selling interest, motion needed etc. Review financials and email M. Bowers to set up a call regarding value of HPE III interest. Call with M. Bowers regarding valuation of HPE interest in Dynamo Fund.	ASG	1.10	\$360.00	\$396.00
08/16/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Sent email to A.Perron re: Brown claim against Southport; reviewed response agreeing to extend deadline to object. Sent email to A.Perron proposing settlement of claim; reviewed response and sent reply.	ACW	0.30	\$400.00	\$120.00
08/16/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Took calls from investors re: claim notices. Sent email to investors responding to questions regarding amounts of allowed claims. Drafted letter to one investor re: claim information. [50% Discount]	ACW	0.30	\$200.00	\$60.00
08/17/2022	ASSET DISPOSITION: Call with R. Tramantano regarding questions raised on sale of BI LLC Interests from J. Woods counsel. Receive and review correspondence and appraisals from R. Tramantano. Send to S. Councill with correspondence.	ASG	0.60	\$360.00	\$216.00
08/17/2022	ASSET DISPOSITION: Updates to Motion, Brief and Notice regarding redemption of US Sampleworks. LLC interests. Hold for first payment due 8/25/2022.	ASG	1.00	\$360.00	\$360.00
08/17/2022	ASSET ANALYSIS & RECOVERY: Update asset memo on the Croft and Bender Fund. Request Q2 2022 Financial Reports from A. David.	ASG	0.40	\$360.00	\$144.00
08/18/2022	ASSET DISPOSITION: Receive correspondence J. Kelley regarding timing of first payment for US Sampleworks. Updates to Motion, Brief and Notice and send to ACW for review and input. Send pleadings to HB Roback, SEC, for review. Send pleadings to L. Burnette for review and input as local counsel.	ASG	0.90	\$360.00	\$324.00
08/18/2022	CASE ADMINISTRATION: Emails with John Chapman re pending arbitration and relationship between arbitration awards and receivership distributions. Conference ACW re the same. Draft letter to FINRA panel re the same.	MLM	0.40	\$350.00	\$140.00



08/18/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Receive and review correspondence with legal argument supporting J. Woods claim. Discuss next steps with ACW.	ASG	0.30	\$360.00	\$108.00
08/18/2022	ASSET DISPOSITION: Finalize proposed court order authorizing sale of BI LLC Interests and forward to ACW.	ASG	0.30	\$360.00	\$108.00
08/19/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Conference ACW re potential settlement with A. Brown. Review and edit draft email re the same.	MLM	0.60	\$350.00	\$210.00
08/19/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Exchanged multiple emails with A.Perron re: A.Brown Claim against Southport and settlement as to claim.	ACW	0.70	\$400.00	\$280.00
08/19/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Emails with Adam Moskowitz, Robert Minkoff, and ACW re hearing on distribution procedures motion.	MLM	0.10	\$350.00	\$35.00
08/19/2022	ASSET DISPOSITION: Reviewed email from D.Chaiken re: proposed sale of BI Development interests. Call with D.Chaiken & S.Council re: same. Reviewed email from D.Chaiken to chambers; reviewed notice of extension of deadline to object posted to docket report. Sent email to J.Curry and B.Issa re: extension of objection period based on concerns about offer price.	ACW	0.70	\$400.00	\$280.00
08/22/2022	ASSET DISPOSITION: Reviewed and responded to email from J.Curry re: extension of objection deadline on sale of interests in BI Developments entities. Sent email to R.Tramantano re: same. Reviewed notice of submission of motion; sent email to A.Holland re: extension of objection deadline to August 26.	ACW	0.30	\$400.00	\$120.00
08/22/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed Order setting hearing on motion regarding investment method for distributions to investors Drafted notice of hearing. Emailed draft to L.Burnette for review and comment.	ACW	0.60	\$400.00	\$240.00
08/22/2022	CASE ADMINISTRATION: Emails with Matt McDonough, Zoe Phillips, Jeff Boujoukos, Marc Fitapelli, and ACW re additional document production to other claimants' attorneys.	MLM	0.20	\$350.00	\$70.00
08/22/2022	ASSET DISPOSITION: Took call from R.Tramantano re: information regarding the BI Development entities.	ACW	0.20	\$400.00	\$80.00
08/22/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed email from investor couple re: distributions to their accounts. Provided additional information in response, including references to docket entries showing deposits to investors' accounts at Provident Trust. Reviewed and responded to email from investors	ACW	1.70	\$200.00	\$340.00



	re: proposal to reduce allowed claim amounts if recovery is made from a source other than the Receivership Estate. [50% Discount]				
08/23/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed mailing from investor & prior communications; sent response re: accountant will review his figures against ours. Reviewed email from investor responding to mine of yesterday & requesting further assistance; sent response. Reviewed voicemail message from investor re: distributions and sent email in response. [50% Discount]	ACW	1.50	\$200.00	\$300.00
08/23/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Began drafting motion and brief relative to Class 5 Claims against Southport.	ACW	2.40	\$400.00	\$960.00
08/25/2022	ASSET DISPOSITION: Review email from Stephen Council re Bassam Issa properties. Review emails from Blake Hauk and Rob Tramantano re the same. Provide feedback to ACW re the same. Review draft email to Stephen Council re the same and provide feedback to ACW. Conference with ACW re discussions with Blake Hauk and Rob Tramantano.	MLM	1.30	\$350.00	\$455.00
08/25/2022	ASSET DISPOSITION: Reviewed email from B.Hendrix of CBL re: offer on BI Development interests. Reviewed email from S.Council re: historical information from J.Woods on those interests. Reviewed information in files re: BI Development interests and real property issues. Calls with R.Tramantano & B.Hauk re: negotiations with CBL & B.Issa. Conferences with MLM re: issues related to BI interests & possible objection by Woods. Drafted email responding to S.Council.	ACW	3.50	\$400.00	\$1,400.00
08/25/2022	CASE ADMINISTRATION: Review draft settlement documents between S.E.C. and Horizon Private Equity, III, LLC prepared by H.B. Roback. Conference ACW re the same.	MLM	0.30	\$350.00	\$105.00
08/25/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed and responded to email from investor re: additional questions. [50% Discount]	ACW	1.50	\$200.00	\$300.00
08/26/2022	CASE ADMINISTRATION: Reviewed draft consent and judgment as to Horizon provided by H.Roback. Call with H.Roback re: same. Emailed requested edits to H.Roback.	ACW	0.30	\$400.00	\$120.00
08/26/2022	CASE ADMINISTRATION: Draft consent motion re claimants seeking production from receiver. Emails with Marc Fitapelli, Jeff Boujoukos, Zoe Phillips, Matt McDonough, and ACW re the same.	MLM	1.80	\$350.00	\$630.00
08/26/2022	ASSET DISPOSITION: Update pleadings regarding US Sampleworks with comments from SEC and L. Boardman.	ASG	0.50	\$360.00	\$180.00

08/26/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed and edited draft motion and brief re: Class 5 claims against Southport. Drafted affidavit in support of same.	ACW	1.70	\$400.00	\$680.00
08/26/2022	CASE ADMINISTRATION: Reviewed and provided comments on consent motion and order re: production of documents to investor claimants who have asserted claims against Oppenheimer.	ACW	0.20	\$400.00	\$80.00
08/29/2022	CASE ADMINISTRATION: Meeting with ACW regarding action needed concerning assets to be liquidated.	ASG	0.30	\$360.00	\$108.00
08/29/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed email from investor re: mailing address & responded with copy of claim notice and claim detail. Reviewed email from investor re: correction in name. Reviewed email re: POA for investor; updated contact information. [50% Discount]	ACW	0.50	\$200.00	\$100.00
08/29/2022	ASSET ANALYSIS & RECOVERY: Call with M. Bowers regarding current value of Dynamo Fund I, LP HPE III Interest and discount rates for sale of interest. Discussed financial information needed to assess value of Skupos and Stord SPV interests. Email to M. Kim regarding offer. Call and correspondence to B. Large to set up a call.	ASG	0.80	\$360.00	\$288.00
08/29/2022	ASSET DISPOSITION: Finalize Motion, Brief, and Notice regarding sale of US Sampleworks, LLC interests and send to R. Patterson for signature on same prior to filing.	ASG	0.30	\$360.00	\$108.00
08/29/2022	ASSET DISPOSITION: Reviewed and responded to email from CPA J.Henegar re: change in ownership of interests held in Birchwood II, LLC & BW Hunting Club, LLC.	ACW	0.20	\$400.00	\$80.00
08/29/2022	ASSET DISPOSITION: Receive and review Notice of Non-Objection involving proposed Receiver sale of BI LLC Interests. Call with R. Tramantano and B. Hauk about next steps. Correspondence to J. Curry and B. Issa regarding same.	ASG	0.80	\$360.00	\$288.00
08/29/2022	CASE ADMINISTRATION: Emails with Russell Patterson and ACW re motion for procedures for sharing documents with claimants' counsel. Review Oppenheimer & Co., Inc.'s proposed edits to the same. Emails with Matt McDonough, Jeff Boujoukos, Ariel Gursky, Zoe Phillips, Russell Patterson, and ACW re the same.	MLM	0.90	\$350.00	\$315.00
08/29/2022	CASE ADMINISTRATION: Draft Notice on Motion for Class 5 Claims Against Southport Capital. Email to ACW for review.	BLF	0.20	\$175.00	\$35.00

08/30/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Review objection to motion to approve and distribute to Southport Capital claims in "Class 4" filed by Jim Woods. Conferences with ACW re the same. Review Southport Capital records re Jim Woods.	MLM	3.00	\$350.00	\$1,050.00
08/30/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed objection to Class 4 Claim filed by Jim Woods. Conferences with MLM re: same. Sent email to chambers re: plans to file a reply. Began drafting reply.	ACW	3.60	\$400.00	\$1,440.00
08/30/2022	ASSET ANALYSIS & RECOVERY: Call from C. Wolford and K. Chambliss regarding BI LLC Interests and facts surrounding same. Call and update to B. Hauk.	ASG	0.50	\$360.00	\$180.00
08/31/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Review ACW notes on reply to Jim Woods response to Southport Capital Class 4 approval and distribution motion. Conferences with ACW re the same. Edit draft reply. Conferences with ACW re the same.	MLM	4.50	\$350.00	\$1,575.00
08/31/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Continued work on reply to J.Woods' objection to treatment of his claim against Southport.	ACW	2.50	\$400.00	\$1,000.00
08/31/2022	ASSET ANALYSIS & RECOVERY: Call with B. Large, Manager of Dynamo Fund I, LP in which HPE holds an interest, discussed avenues to liquidate, sending correspondence to other current LPs, discussed Skupos and Stord SPV values and related issues. Discussed action needed with ACW. Draft offering letter to other current LPs of Dynamo Fund.	ASG	1.50	\$360.00	\$540.00
08/31/2022	ASSET ANALYSIS & RECOVERY: Relevance Fund - review LP Agreement for term and funding.	ASG	0.30	\$360.00	\$108.00
08/31/2022	CASE ADMINISTRATION: Telephone call from John Chapman re recent FINRA arbitration hearing. Conference ACW re the same.	MLM	0.40	\$350.00	\$140.00
08/31/2022	ASSET DISPOSITION: Correspondences with R. Patterson regarding Motion to Sell LLC interests in US Sampleworks. Have filed and served.	ASG	0.20	\$360.00	\$72.00
08/31/2022	ASSET DISPOSITION: Receive call from B. Hauk regarding addition of term in BI Sale agreement to capture sale proceeds if real property is sold by LLC's within certain time frame.	ASG	0.20	\$360.00	\$72.00
08/31/2022	ASSET DISPOSITION: Receive call B. Hauk regarding negotiation and updated agreement with B. Issa and CBL regarding the BI Developments Interests. Amend Membership Purchase Agreement to incorporate updated tail term. Draft Reply to Woods's Response to Sale.	ASG	1.20	\$360.00	\$432.00

08/31/2022	ASSET DISPOSITION: Reviewed draft letter prepared by ASG re: interests in Dynamo fund, Skupos & Stord and made suggested changes.	ACW	0.20	\$400.00	\$80.00
08/31/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed email exchanges with investors in comparison with claims spreadsheet and noted any corrections in preparation for hearing next week.	ACW	1.40	\$400.00	\$560.00
09/01/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Review email records re promissory notes between Jim Woods and Horizon Private Equity III. Revise reply to Jim Woods response to Southport Capital Class 4 motion. Conferences with ACW re the same. Conference call with John Spillman and ACW re the same. Emails with Russell Patterson, Marcy Morian, H.B. Roback, and ACW re the same.	MLM	3.50	\$350.00	\$1,225.00
09/01/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Made edits to reply to response filed by Jim Woods to motion on class 4 claims against Southport.	ACW	0.50	\$400.00	\$200.00
09/01/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed correspondence with investors re: allowed claim amounts against spreadsheet. Reviewed proofs of claim and responses. Updated spreadsheet. [50% Discount]	ACW	5.60	\$200.00	\$1,120.00
09/01/2022	ASSET DISPOSITION: Receive and review proposed Post Acquisition from B. Hendrix regarding BI Interests. Update proposed amended Agreement regarding same and forward to ACW for review and input. Correspondence to B. Hendrix, J. Curry, B. Issa and others with updated Membership Purchase Agreement. Continue to draft Reply and proposed Court Order regarding sale of BI Interests. Finalize Reply and Order and send to HB Roback for review. Also send to R. Patterson for review and input. Confirm from B. Hendrix that Amended Agreement is acceptable and he will circulate for signature.	ASG	1.70	\$360.00	\$612.00
09/01/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Call with J.Spillman & MLM re: implications of Jim Woods' suggestion that he not be required to comply with transition agreement.	ACW	0.30	\$400.00	\$120.00
09/02/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Sent email to R.Patterson re: draft reply to Jim Woods' objection to motion regarding Class 4 claims against Southport Capital.	ACW	0.10	\$400.00	\$40.00
09/02/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Calls with R.Patterson re: reply to Woods' objection; reply relative to sale of interests in BI Development entities.	ACW	0.10	\$400.00	\$40.00
09/02/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Began drafting motion and brief on disallowance of certain	ACW	1.80	\$400.00	\$720.00

	investor claims for accounts that appear to be closed.				
09/02/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Revise rising tide distribution model spreadsheet.	MLM	3.50	\$350.00	\$1,225.00
09/02/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed claims spreadsheet and made edits in preparation for hearing on distribution method and motion for claims allowances.	ACW	0.70	\$400.00	\$280.00
09/02/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Finalize and file reply to Jim Woods response to Southport Capital Class 4 distribution motion.	MLM	0.50	\$350.00	\$175.00
09/06/2022	ASSET DISPOSITION: Receive updated Sale Agreement regarding BI LLC Interests executed by Wolftever II, LLC, CBL and First Volunteer. Receive input on Reply from R. Patterson. Update and collate Reply and Exhibits and forward to BLF for filing with Court.	ASG	0.50	\$360.00	\$180.00
09/06/2022	CASE ADMINISTRATION: Took call from H.Roback re: question regarding my settlement with Southport Capital.	ACW	0.10	\$400.00	\$40.00
09/06/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed email from J.Green re: invoice from Invicta. Sent email to Southport attorneys re: level of service Southport requires at this stage; reduction in monthly charges.	ACW	0.10	\$400.00	\$40.00
09/06/2022	CASE ADMINISTRATION: Reviewed email and letter from M.Meeks at Tennessee Department of Commerce requesting list of investors who are Tennessee residents.	ACW	0.10	\$400.00	\$40.00
09/06/2022	ASSET ANALYSIS & RECOVERY: Receive and review Q2 financial reports from the Croft and Bender Fund. Draft solicitation letter and send to R. Goldman with correspondence with suggestion of how to liquidate HPE III interests in the Fund.	ASG	0.60	\$360.00	\$216.00
09/06/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Revise distribution alternatives spreadsheet.	MLM	0.40	\$350.00	\$140.00
09/06/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed draft motion to disallow certain claims and brief on same. Drafted affidavit in support of motion.	ACW	1.30	\$400.00	\$520.00
09/06/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Review Motion for Disallowance of Certain Investor Claims and Memorandum in Support of Motion. Draft Notice regarding same. Email Notice to ACW.	BLF	0.40	\$175.00	\$70.00
09/06/2022	CASE ADMINISTRATION: Review arbitration award entered against Oppenheimer & Co. Inc. Emails with John Chapman re the same. Conferences with ACW re the same.	MLM	0.30	\$350.00	\$105.00

09/06/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed arbitration award entered against Oppenheimer in favor of certain investors. Sent email to MLM re: certain plaintiff investors are net winners; impact on claims pool relative to plaintiffs that are due to receive 100% in principal back from Oppenheimer.	ACW	0.70	\$400.00	\$280.00
09/06/2022	CASE ADMINISTRATION: Reviewed letter from Tennessee Department of Commerce requesting information as to Tennessee residents who were impacted by J.Woods. Requested list from Stretto of those on the notice list who have Tennessee addresses. Sent email to investors with Tennessee addresses re: request from TN Department of Commerce. Responded to letter from TN Department of Commerce with names & addresses of investors who appear to be Tennessee residents.	ACW	0.40	\$400.00	\$160.00
09/06/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Review Motion for Disallowance of Certain Investor Claims, Brief in Support and Affidavit. Draft notice regarding same, email to ACW.	BLF	0.20	\$175.00	\$35.00
09/07/2022	CASE ADMINISTRATION: Reviewed information regarding Horizon's investment in Southport Capital and settlement between Southport Capital and the receivership and sent email to H.Roback re: same.	ACW	0.50	\$400.00	\$200.00
09/07/2022	CASE ADMINISTRATION: Sent email to S.Council & D.Chaiken re: emails that may not have been produced previously.	ACW	0.20	\$400.00	\$80.00
09/07/2022	ASSET ANALYSIS & RECOVERY: Correspondences with R. Goldman General Partner of Croft and Bender Fund regarding plan and process to solicit purchasers for the HPE interest in the Fund. Call with R. Goldman regarding same.	ASG	0.40	\$360.00	\$144.00
09/07/2022	ASSET ANALYSIS & RECOVERY: Memo to BLF regarding search in Logickull for all documents related to assets yet to be sold.	ASG	0.30	\$360.00	\$108.00
09/07/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed investor spreadsheet and analyzed impact of arbitration awards to certain investors. Reviewed net winner accounts. Sent email to E.Bowers re: issues regarding recoveries from net winners.	ACW	1.30	\$400.00	\$520.00
09/07/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Began work on motion requesting process for setting off recoveries from third parties against allowed claims.	ACW	0.70	\$400.00	\$280.00
09/07/2022	CASE ADMINISTRATION: Research Logickull for documents re various assets that have not been sold for ASG.	BLF	1.30	\$175.00	\$227.50
09/08/2022	CASE ADMINISTRATION: Emails with John Chapman,	MLM	0.30	\$350.00	\$105.00

	Marc Fitapelli, Jeffrey Saxon, and Clark Walton re electronically stored records.				
09/08/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed and made notes in preparation for hearing tomorrow on distribution method.	ACW	0.40	\$400.00	\$160.00
09/08/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Prepare for hearing on distribution procedures motion. Conferences and emails with ACW re the same.	MLM	2.00	\$350.00	\$700.00
09/08/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Began work on motion requesting process for setting off recoveries from third parties against allowed claims.	ACW	1.30	\$400.00	\$520.00
09/08/2022	CASE ADMINISTRATION: Review Motion for Allowance of Class 5 Claims Against Southport Capital, Brief, Affidavit and Notice. File same.	BLF	0.30	\$175.00	\$52.50
09/08/2022	CASE ADMINISTRATION: Research Logickull for documents re various assets that have not been sold for ASG.	BLF	1.00	\$175.00	\$175.00
09/09/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Prepare for hearing on distribution procedures motion. Conferences with ACW re the same.	MLM	3.00	\$350.00	\$1,050.00
09/09/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed FINRA decision dated 9-5-22 in favor of certain investors and made notes.	ACW	0.20	\$400.00	\$80.00
09/09/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed in preparation for hearing on distribution method. Conferences with MLM re: hearing preparation.	ACW	1.30	\$400.00	\$520.00
09/09/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Revised proposed order on distribution method to reflect today's hearing. Circulated draft to H.Roback & D.Chaiken for comment. Took call from H.Roback; made edits to order and recirculated same. Sent email to chambers re: draft proposed order is being circulated.	ACW	0.70	\$400.00	\$280.00
09/09/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Appeared at zoom hearing on distribution method.	ACW	0.80	\$400.00	\$320.00
09/12/2022	ASSET ANALYSIS & RECOVERY: Reviewed email from H.Roback re: Note due from Horizon Private Equity, LLC to receivership estate. Researched latest communication regarding Note and responded to H.Roback re: demand and response to same.	ACW	0.20	\$400.00	\$80.00
09/12/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Review proposed revisions to order approving distribution procedures motion.	MLM	0.10	\$350.00	\$35.00
09/12/2022	ASSET ANALYSIS & RECOVERY: Review memorandum from summer clerk re support for claims	MLM	3.10	\$350.00	\$1,085.00



	against third parties. Review Opinion and Order on Oppenheimer & Co., Inc.'s motion to dismiss 6694 Dawson Blvd. lawsuit. Conference ACW re the same. Review pleadings in Hatfield FINRA arbitration.				
09/13/2022	ASSET ANALYSIS & RECOVERY: Review electronic records for potential assets, including claims against third parties. [50% Discount]	MLM	2.70	\$175.00	\$472.50
09/13/2022	ASSET DISPOSITION: Receive Order authorizing Sale and Transfer of BI LLC interests. Have Membership Agreement and Assignment documents executed by ACW and forward to B. Issa, CBL and others.	ASG	0.30	\$360.00	\$108.00
09/13/2022	ASSET ANALYSIS & RECOVERY: Correspondences with B. Large regarding SPV's held by HPE related to Dynamo Fund and information needed.	ASG	0.20	\$360.00	\$72.00
09/13/2022	ASSET ANALYSIS & RECOVERY: Receive and brief review of Q2 financials of Relevance Funds, forward to M. Bowers.	ASG	0.30	\$360.00	\$108.00
09/14/2022	ASSET ANALYSIS & RECOVERY: Review electronic records for potential assets, including claims against third parties. [50% Discount]	MLM	0.60	\$175.00	\$105.00
09/14/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Draft email to Adam Moskowitz re status of claims. Conference ACW re the same.	MLM	0.30	\$350.00	\$105.00
09/14/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Conference C. Wright re procedure for dealing with claim buyers and distribution scenarios in light of future distributions to a portion of claim pool from Oppenheimer.	JWG	0.50	\$600.00	\$300.00
09/14/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Conference with JWG re: procedure for adjusting claims to account for recoveries from other sources.	ACW	0.50	\$400.00	\$200.00
09/14/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Conferences with ACW re offsetting claims based on recoveries from outside of receivership.	MLM	0.40	\$350.00	\$140.00
09/14/2022	ASSET ANALYSIS & RECOVERY: Call from party interested in Dynamo Fund, discussed process.	ASG	0.30	\$360.00	\$108.00
09/14/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Took calls and returned emails to investors regarding questions about claims and distributions. [50% Discount]	ACW	0.20	\$200.00	\$40.00
09/14/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Drafted motion for authority to disclose investors' contact information to potential claims buyer. Began drafting supporting brief re: same.	ACW	1.10	\$400.00	\$440.00
09/15/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Review	MLM	1.50	\$350.00	\$525.00



	Logikcull database for information on investor. Conferences with ACW re the same.				
09/15/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed related accounts and transactions to determine appropriate claim amount relative to account that was transferred from decedent to heirs. Sent email to E.Bowers re: same. [50% Discount]	ACW	0.70	\$200.00	\$140.00
09/15/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Continued work on pleadings re: disclosure of investor contact information to claims buyer. Reviewed documents provided by ASM and made redline edits.	ACW	3.70	\$400.00	\$1,480.00
09/15/2022	ASSET ANALYSIS & RECOVERY: Review electronic records for potential assets, including claims against third parties. [50% Discount]	MLM	2.10	\$175.00	\$367.50
09/16/2022	ASSET ANALYSIS & RECOVERY: Review electronic records for potential assets, including claims against third parties. [50% Discount]	MLM	2.00	\$175.00	\$350.00
09/16/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed and edited draft pleadings regarding release of investor contact information to claims buyers. Reviewed comments by MLM re: same & made edits. Drafted notice relative to motion. Emailed drafts to R.Patterson for review.	ACW	1.80	\$400.00	\$720.00
09/16/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Review draft motion to disclose investor contact information to claims buyers and supporting documents.	MLM	2.10	\$350.00	\$735.00
09/16/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Conference ACW re accounting for investor recoveries from extraneous sources in making distributions.	MLM	0.30	\$350.00	\$105.00
09/16/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Worked on consolidating certain related investors' claims. [50% Discount]	ACW	1.00	\$200.00	\$200.00
09/19/2022	ASSET ANALYSIS & RECOVERY: Review electronic records for potential assets, including claims against third parties. [50% Discount]	MLM	2.20	\$175.00	\$385.00
09/19/2022	CASE ADMINISTRATION: Review revised draft consent to final judgment for Horizon Private Equity, III, LLC prepared by H.B. Roback.	MLM	0.20	\$350.00	\$70.00
09/19/2022	CASE ADMINISTRATION: Reviewed draft Consent and Final Judgment as to Horizon provided by H.Roback.	ACW	0.40	\$400.00	\$160.00
09/19/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Edited order on motion to allow class 4 claims against Southport Capital per request from chambers.	ACW	0.60	\$400.00	\$240.00
09/19/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Review	MLM	0.30	\$350.00	\$105.00

	revised draft proposed order granting Southport Capital Class 4 distribution motion. Provide feedback to ACW re the same.				
09/20/2022	ASSET ANALYSIS & RECOVERY: Review electronic records for potential assets, including claims against third parties. [50% Discount]	MLM	3.40	\$175.00	\$595.00
09/20/2022	ASSET ANALYSIS & RECOVERY: Follow up with B. Large on need for financial information on SPV value of Skupos, LLC and Stord, LLC.	ASG	0.10	\$360.00	\$36.00
09/20/2022	ASSET DISPOSITION: Receive notice from court regarding submission of of Order on US Sampleworks, LLC interests. Update proposed Order and forward to ACW to submit to the Court for consideration. Update to J. Kelley.	ASG	0.70	\$360.00	\$252.00
09/20/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Review draft email to John Chapman re obtaining client list and other information. Provide feedback to ACW re the same.	MLM	0.10	\$350.00	\$35.00
09/21/2022	ASSET ANALYSIS & RECOVERY: Review electronic records for potential assets, including claims against third parties. [50% Discount]	MLM	1.10	\$175.00	\$192.50
09/21/2022	ASSET ANALYSIS & RECOVERY: Receive and review Account Statements of HPEs investment in Stord and Skupos. Send to M. Bowers to ask what additional financial information is needed to assess value for a potential sale analysis. Correspondences with M. Bowers regarding same.	ASG	0.30	\$360.00	\$108.00
09/21/2022	ASSET DISPOSITION: Receive Court Order authorizing redemption of US Sampleworks, LLC interests, have ACW sign Redemption Agreement, send Order and Agreement to J. Kelly with correspondence regarding same.	ASG	0.30	\$360.00	\$108.00
09/21/2022	ASSET ANALYSIS & RECOVERY: Review amended class action complaint against Oppenheimer & Co., Inc.	MLM	0.80	\$350.00	\$280.00
09/21/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Compared list of investor names that do not have addresses provided by Stretto; noted which of those accounts are included among net winners on claims spreadsheet. [50% Discount]	ACW	1.50	\$200.00	\$300.00
09/22/2022	ASSET ANALYSIS & RECOVERY: Review electronic records for potential assets, including claims against third parties.	MLM	3.30	\$350.00	\$1,155.00
09/22/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Added investors' account numbers to Stretto matrix. Researched certain accounts on the Stretto list. [50% Discount]	ACW	2.30	\$200.00	\$460.00

09/22/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Compared list of net winner accounts for investors not known to be deceased with accounts that do not have addresses on Stretto matrix. [50% Discount]	ACW	1.20	\$200.00	\$240.00
09/22/2022	CASE ADMINISTRATION: Reviewed proposed amended complaint bought on behalf of investors against Oppenheimer.	ACW	0.50	\$400.00	\$200.00
09/22/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Telephone call from John Chapman re accounting for third party claim recoveries in making interim distributions. Conference with ACW re the same.	MLM	0.40	\$350.00	\$140.00
09/22/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Began adding net claim amounts to Stretto matrix. [50% Discount]	ACW	1.40	\$200.00	\$280.00
09/23/2022	ASSET ANALYSIS & RECOVERY: Call with M. Bowers regarding information needed to understand value of Stord and Skupos SPV investments of HPE in the Dynamo Fund.	ASG	0.20	\$360.00	\$72.00
09/23/2022	ASSET ANALYSIS & RECOVERY: Review files on outstanding Promissory Notes owing to HPE III from HPE I and USA Sands, LLC. Correspondence to D. Chaiken regarding whether there is more information about them and challenges to collection efforts.	ASG	0.40	\$360.00	\$144.00
09/23/2022	CASE ADMINISTRATION: Reviewed email from H.Roback re: consent and judgment against Horizon. Call to H.Roback re: same. Sent email to H.Roback re: draft documents.	ACW	0.30	\$400.00	\$120.00
09/23/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Continued work on claims matrix. Brief conference with BLF re: plans for double-checking claim information. Exchanged emails with R.Laws re: entering claim information in software. [50% Discount]	ACW	2.40	\$200.00	\$480.00
09/23/2022	ASSET ANALYSIS & RECOVERY: Call with R. Tramantano with regarding to C. Wolford real property projects and HPE III interest in same.	ASG	0.20	\$360.00	\$72.00
09/23/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Calls from A.Moskowitz re: claim buyer motion and related issues.	ACW	0.30	\$400.00	\$120.00
09/23/2022	CASE ADMINISTRATION: Reviewed pleadings in SEC v. Mooney, et al.	ACW	0.40	\$400.00	\$160.00
09/26/2022	ASSET ANALYSIS & RECOVERY: Review electronic records for potential assets, including claims against third parties. [50% Discount]	MLM	3.00	\$175.00	\$525.00
09/27/2022	ASSET ANALYSIS & RECOVERY: Review electronic records for potential assets, including claims against third parties. [50% Discount]	MLM	1.20	\$175.00	\$210.00

09/27/2022	CASE ADMINISTRATION: Call from M. Bowers regarding assets in case and information needed as he prepares tax forms. Review various asset spreadsheets and discuss accurate one with ACW to send to M. Bowers.	ASG	0.40	\$360.00	\$144.00
09/27/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed ecf notice re: motion for allowance of Class 5 Claims against Southport Capital has been submitted and uploaded proposed Order on motion.	ACW	0.10	\$400.00	\$40.00
09/28/2022	ASSET ANALYSIS & RECOVERY: Receive and review current financial information on the Croft and Bender fund along with a proposed Transfer Agreement from R. Goldman. Send financials to M. Bowers for analysis. Review proposed Transfer Agreement. Revise proposed Transfer Agreement. Correspondence to R. Goldman regarding next steps to sell interest. Call from M. Bowers to discuss value of the interest and fair value from business advisor's point of view. Call with R. Goldman regarding process, questions, value. Review LP Agreement for parameters in selling an LP Interest. Follow up correspondence to R. Goldman.	ASG	2.50	\$360.00	\$900.00
09/28/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Emails with Marc Fitapelli re arbitration matter against Oppenheimer & Co., Inc. Draft letter re double recoveries. Emails with ACW re third-party recovery issues.	MLM	0.40	\$350.00	\$140.00
09/28/2022	ASSET ANALYSIS & RECOVERY: Review file information regarding ProNVest. Correspondence to J. Delgado, counsel to ProNVest regarding need for current financial information and query whether company has offer to purchase HPE's interest in same.	ASG	0.80	\$360.00	\$288.00
09/28/2022	ASSET ANALYSIS & RECOVERY: Call with R. Tramantano and ACW regarding negotiations with C. Wolford and status of projects and debt on same. Review historical bank information regarding carrying costs on the projects and send information to R. Tramantano to assist in his negotiations.	ASG	0.60	\$360.00	\$216.00
09/28/2022	ASSET ANALYSIS & RECOVERY: Receive and brief review of Stord and Skupos financial information. Send to M. Bowers for evaluation.	ASG	0.30	\$360.00	\$108.00
09/29/2022	ASSET ANALYSIS & RECOVERY: Review electronic records for potential assets, including claims against third parties. [50% Discount]	MLM	5.80	\$175.00	\$1,015.00
09/29/2022	ASSET ANALYSIS & RECOVERY: Receive offer on HPE Interest in Dynamo Fund. Review Q2 financials and compare same. Send offer and information to M. Bowers for his input on offer.	ASG	0.40	\$360.00	\$144.00
09/29/2022	ASSET ANALYSIS & RECOVERY: Draft solicitation	ASG	0.70	\$360.00	\$252.00

	letters regarding Horizon Interests in Dynamo Fund as well as in Skupos, LLC and Stord III SPV. Pull and attach recent capital account statements.				
09/29/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Emails with Jeff Boujoukos re new subpoena to Oppenheimer & Co., Inc. re claimants.	MLM	0.10	\$350.00	\$35.00
09/29/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Investor claim spreadsheet review and compare with SGM.	BLF	1.70	\$175.00	\$297.50
09/29/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Review creditor matrix for accuracy with BLF.	SM	1.70	\$125.00	\$212.50
09/30/2022	ASSET ANALYSIS & RECOVERY: Review electronic records for potential assets, including claims against third parties. Conference ACW re the same. [50% Discount]	MLM	4.90	\$175.00	\$857.50
09/30/2022	ASSET ANALYSIS & RECOVERY: Finalize letters regarding Dynamo Fund, Skupos SPV and Stord SPV soliciting offers for Horizon Interest. Send to B. Large, Manager of Dynamo Fund to have them sent to current Dynamo Fund LPs.	ASG	0.40	\$360.00	\$144.00
09/30/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Reviewed claim documentation provided by L.Duskin re: investor claim. Sent email to E.Bowers re: same.	ACW	0.20	\$400.00	\$80.00
09/30/2022	CLAIMS ADMINISTRATION & OBJECTIONS: Worked on pleadings regarding adjustments to allowed claims held by investors who recover from third parties.	ACW	1.10	\$400.00	\$440.00
<b>Quantity Subtotal</b>					<b>348.2</b>

<b>Time Keeper</b>	<b>Quantity</b>	<b>Rate</b>	<b>Total</b>
Summer Clerk	30.7	\$100.00	\$3,070.00
Anna S. Gorman	42.4	\$360.00	\$15,264.00
Joseph W. Grier, III	0.5	\$600.00	\$300.00
Michael L. Martinez	57.2	\$350.00	\$20,020.00
Michael L. Martinez	29.0	\$175.00	\$5,075.00
A. Cotten Wright	105.4	\$400.00	\$42,160.00
A. Cotten Wright	73.6	\$200.00	\$14,720.00
Brittany L. Franklin	7.7	\$175.00	\$1,347.50
Stephanie Miller	1.7	\$125.00	\$212.50
<b>Quantity Total</b>			<b>348.2</b>

<b>Subtotal</b>	<b>\$102,169.00</b>
<b>Invoice Discount</b>	<b>5.0%</b>
<b>Total</b>	<b>\$97,060.55</b>

## Detailed Statement of Account

### Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
767	11/07/2022	\$1,995.84	\$0.00	\$1,995.84

### Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
766	11/07/2022	\$97,060.55	\$0.00	\$97,060.55
<b>Outstanding Balance</b>				<b>\$99,056.39</b>
<b>Total Amount Outstanding</b>				<b>\$99,056.39</b>

### Trust Account

Date	Type	Notes	Matter	Receipts	Payments	Balance
<b>Trust Account Balance</b>					<b>\$0.00</b>	

Please make all amounts payable to: Grier Wright Martinez, PA  
Our tax ID is 56-1643255



## Grier Wright Martinez, PA

521 E. Morehead St., Suite 440  
Charlotte, NC 28202  
United States  
Phone: (704) 375-3720  
www.grierlaw.com

## STATEMENT

Statement # 767  
Date: 10/19/2022  
Due On: 11/07/2022

A Cotten Wright

**21-10168/Wright**

**Horizon Private Equity III, LLC Receivership**

Date	Notes	Quantity	Rate	Total
07/01/2022	FedEx: Fedex	1.00	\$216.19	\$216.19
07/06/2022	FedEx: Fedex Expense	1.00	\$24.47	\$24.47
07/08/2022	Postage: Postage Expense for Claims Notices	435.00	\$0.57	\$247.95
07/08/2022	Copies: Copies of Proof of Claim Form	870.00	\$0.10	\$87.00
07/14/2022	FedEx: Fedex Expense	1.00	\$24.22	\$24.22
07/20/2022	Nextiva - Phone Line	1.00	\$34.91	\$34.91
07/31/2022	Logikull - Monthly Software Fee	1.00	\$328.50	\$328.50
08/19/2022	Nextiva - Phone Line	1.00	\$34.91	\$34.91
08/25/2022	Online Research - Pacer: Online Research - Pacer July 2022	1.00	\$23.90	\$23.90
08/31/2022	Logikull - Monthly Software Fee	1.00	\$250.25	\$250.25
09/02/2022	Online Research - Pacer: August 2022 Pacer Charges	1.00	\$17.80	\$17.80
09/08/2022	Postage: Postage	9.00	\$1.52	\$13.68

09/08/2022	Postage: Postage	8.00	\$0.57	\$4.56
09/08/2022	Copies: Copies	333.00	\$0.10	\$33.30
09/08/2022	Copies: Copy	1.00	\$4.00	\$4.00
09/30/2022	Online Research - Pacer: September 2022 Pacer Charges	1.00	\$50.20	\$50.20
09/30/2022	Reliance Forensics, Llc: E-Discovery Services	1.00	\$350.00	\$350.00
09/30/2022	Monthly Software Fee	1.00	\$250.00	\$250.00

Time Keeper	Quantity	Rate	Total
		<b>Subtotal</b>	<b>\$1,995.84</b>
		<b>Total</b>	<b>\$1,995.84</b>

## Detailed Statement of Account

### Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
766	11/07/2022	\$97,060.55	\$0.00	\$97,060.55

### Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
767	11/07/2022	\$1,995.84	\$0.00	\$1,995.84
<b>Outstanding Balance</b>				<b>\$99,056.39</b>
<b>Total Amount Outstanding</b>				<b>\$99,056.39</b>

### Trust Account

Date	Type	Notes	Matter	Receipts	Payments	Balance
<b>Trust Account Balance</b>					<b>\$0.00</b>	

Please make all amounts payable to: Grier Wright Martinez, PA  
Our tax ID is 56-1643255





**EXHIBIT F****Summary of Expenses Incurred by  
Grier Wright Martinez, PA for Application Period**

<b>Expense Category</b>	<b>Amount</b>
Court Fees and Charges	\$0.00
Postage	\$266.19
Transcripts	\$0.00
Copies	\$124.30
Federal Express charges	\$264.88
Pacer-Online Research	\$91.90
Scanning	\$0.00
E-Discovery Software	\$828.75
E-Discovery	\$350.00
Telephone	\$69.82
<b>Total</b>	<b>\$1,995.84</b>